

# Plaintiff's EXHIBIT H

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 Case No. 16-cv-6953(PKC)

- - - - -x

5 RONALD WOOLF,

6 Plaintiff,

7 -against-

8 BLOOMBERG L.P.,  
9 ANDREW BOWYER, individually,  
10 MELISSA STRADA, individually,  
11 MATHEW ASMAN, individually,  
12 MICHAEL MORRIS, individually, and  
13 JIM NIZIOLEK, individually,  
14 Defendants.

- - - - -x

September 25, 2017  
9:35 a.m.

15  
16 Videotaped Deposition of  
17 RONALD WOOLF, taken by Defendant, pursuant  
18 to Notice, held at the offices of  
19 EPSTEIN BECKER & GREEN PC, 250 Park  
20 Avenue, New York, New York, before  
21 Sharon Lengel, a Registered Professional  
22 Reporter, Certified Realtime Reporter, and  
23 Notary Public of the State of New York.

24  
25 \* \* \*

1 WOOLF

2 can go forward and give truthful testimony  
3 this afternoon.

4 A. Yes.

5 Q. All right. So I want to, then,  
6 go back to something we were talking about  
7 before the lunch break, which was your  
8 communication with Melissa Strada.

9 MR. GARLAND: Let's mark as  
10 Exhibit RW20 a handwritten two-page  
11 note from the plaintiff to Ms. Strada  
12 with the Woolf production numbers 58  
13 and 59.

14 (Exhibit RW20, A handwritten  
15 note, Bates WOOLF000058, was hereby  
16 marked for identification, as of this  
17 date.)

18 Q. You have in front of you what's  
19 been marked as Exhibit RW20.

20 Is that a --

21 A. Yes.

22 Q. -- handwritten note that you  
23 wrote to Melissa Strada?

24 A. Yes, it is.

25 Q. Did you give it to her on or

1 WOOLF

2 about March 19, 2013, at 12:30 p.m.?

3 A. I put it under her keyboard.

4 She was out to lunch, I believe, at

5 12:30 p.m.

6 Q. On March 19th --

7 A. On March 19th.

8 Q. Again, remember, please let me  
9 finish my question before you begin your  
10 answer.

11 A. Apologies.

12 Q. So you left it in her office on  
13 March 19, 2013, at around 12:30 p.m.

14 A. That is correct.

15 Q. When did you write it?

16 A. Probably an hour before.

17 Q. Where were you when you wrote  
18 it?

19 A. At my desk.

20 Q. At Bloomberg?

21 A. Yes.

22 Q. 731 Lexington?

23 A. Yes.

24 Q. So if we look at the handwritten  
25 note, the second paragraph -- well, let's

1 WOOLF  
2 start with the first paragraph. You wrote  
3 as follows: "I have just about of enough  
4 of what is obviously an intentional and  
5 concerted effort to discredit my work."

6 Is what follows in this  
7 handwritten note your summary of the  
8 intentional and concerted effort to  
9 discredit your work?

10 A. Could I read it?

11 Q. Please.

12 A. (Witness perusing document.)

13 Right. So I wrote this, and I  
14 urgently wanted to speak to her following  
15 up the conversation I had with her --

16 Q. Let me repeat the question for  
17 you.

18 A. Okay.

19 Q. Is what follows the first  
20 paragraph in RW20 a summary or a statement  
21 of what you were referring to in the first  
22 paragraph when you wrote about an  
23 intentional and concerted to discredit  
24 your work?

25 A. Yes, it is.

1 WOOLF

2 Q. All right. So then let's look  
3 at that second paragraph, and on that  
4 second paragraph, second line, there's a  
5 reference to IB, capital "I," capital "B."

6 What does that refer to?

7 A. That's internal messaging, or I  
8 think it's Instant Bloomberg. I think it  
9 stands for Instant Bloomberg. But it's  
10 like a chat session on your computer.

11 Q. Then on the third line of that  
12 second paragraph, you refer to "a very  
13 senior colleague."

14 Who was that?

15 A. Susan Lasovick.

16 Q. Spell her last name, please.

17 A. L-A-S-O-V-I-C-K.

18 Q. Then in the second -- on the  
19 second page, there's a reference to a CFA  
20 reimbursement request.

21 What does CFA stand for?

22 A. Certified financial analyst.

23 Q. So you left this note with

24 Ms. Strada.

25 Did you get a response from her?



1 WOOLF

2 A. Yes.

3 Q. In what form was the response?

4 A. I believe we had a second  
5 conversation and also an email exchange.

6 Q. And when did the second  
7 conversation take place?

8 A. I don't recall the dates.

9 Q. Approximately when in relation  
10 to your --

11 A. Within --

12 Q. Please let me finish.

13 When in relation to your  
14 dropping off RW20 by her keyboard did the  
15 second conversation take place?

16 A. I think it happened within -- I  
17 think it happened within that day, if not  
18 early morning the next day.

19 Q. Was it in person or over the  
20 phone?

21 A. I believe that one was in  
22 person.

23 Q. Where did it take place?

24 A. It would have been in a  
25 conference room.

1 WOOLF

2 Q. Who was present?

3 A. Me and Melissa Strada.

4 Q. Anyone else?

5 A. Not to my knowledge, no. I  
6 don't remember anyone else.

7 Q. Did you take any notes of what  
8 was said?

9 A. No.

10 Q. What did she say to you and what  
11 did you say to her?

12 A. Well, it was a followup to the  
13 conversation on the previous Friday that  
14 where I was complaining specifically about  
15 what I considered a hostile work  
16 environment, legitimate or delegitimate  
17 characterizations of my work product, very  
18 odd emails where I was criticized for  
19 something very, very minor like reaching  
20 out or making a phone call, instead of at  
21 2:00, at 3:00, something of that nature.  
22 And the stress was mounting. And what --  
23 what was the tipping point was that,  
24 first, Andrew Bowyer didn't understand my  
25 job. So I had to educate him about how I